

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)	
Deadline for completion of Rule 26(a) initial disclosures and any HIPAA-complaint records authorizations: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	May 3, 2019
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	July 17, 2019
Date for initial settlement conference: <i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	Sept. 25, 2019
Phase II (Discovery and Motion Practice)	
Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post initial settlement conference)</i>	Sept. 3, 2019
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	Sept. 18, 2019
All fact discovery completed by: <i>(Presumptively 3.5 months post first requests for documents/interrogatories)</i>	Nov. 13, 2019
Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	Not anticipated
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	N/A
COMPLETION OF ALL DISCOVERY BY: <i>(Presumptively 9 months after Initial Conference)</i>	Nov. 13, 2019 December
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	Dec. 13, 2019
Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	Yes